

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

H&R BLOCK, INC. and HRB  
INNOVATIONS, INC.,

Plaintiffs,

v.

BLOCK, INC.,

Defendant.

Case No. 4:21-cv-00913-NKL

**UNOPPOSED MOTION TO SUBSTITUTE REPLY SUGGESTIONS (DOC. #59)**

Plaintiffs H&R Block, Inc. and HRB Innovations, Inc. (together “Block”) hereby bring this *Unopposed* Motion to Substitute Reply Suggestions (Doc. #59), and in support thereof state the following:

1. Block filed its Reply Suggestions in Further Support of Plaintiffs’ Motion for A Preliminary Injunction in this case via ECF as Doc. 59 (the “Reply”).
2. After the filing, Defendant Block, Inc. objected that the Reply contains five words<sup>1</sup> that it contends are Confidential and should not be publicly-filed.<sup>2</sup>
3. Block believed that it had permission from Defendant to include the information at issue in its publicly-filed Reply and does not concede that it is properly designated by Defendant as Confidential. Nonetheless, to resolve the dispute, Block respectfully moves the Court to remove the current Doc. 59 from the Docket (so that it will not be publicly accessible), and substitute the amended version of the Reply attached hereto as Exhibit A in its place (the

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<sup>1</sup> In an abundance of caution, Block has refrained from specifying the words at issue so as to avoid repeating or calling attention to them on the docket. However, should the Court require further specificity, Block would of course supply any information the Court desires on this issue.

<sup>2</sup> No Protective Order has yet been entered in the case. *See* Doc. 45 (pending joint motion for protective order).

“Amended Reply”). The Amended Reply replaces the language at issue with wording Defendant agrees may be filed publicly.

4. Block’s counsel has conferred with Defendant’s counsel about the relief requested and understands Defendant is in agreement with this request.

Wherefore, Block respectfully requests that the Court grant this unopposed motion, and direct the clerk to remove the current Reply (Doc. 59) from the public docket and substitute the Amended Reply in its place.

Respectfully submitted,

Dated: January 24, 2022

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***ATTORNEYS FOR PLAINTIFFS H&R BLOCK,  
INC. AND HRB INNOVATIONS, INC.***

**CERTIFICATE OF SERVICE**

I hereby certify that on January 24, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF, which will generate and send a Notice of Electronic Filing to all counsel of record.

/s/ Stacey R. Gilman  
***Attorney for Plaintiffs***